

## EXHIBIT A

## Asher, Monica

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**From:** Levander, Samuel <slevander@cgsh.com>  
**Sent:** Tuesday, July 28, 2020 10:22 PM  
**To:** Kratenstein, Andrew; Asher, Monica  
**Cc:** Rosenthal, Jeffrey A.; Vicens, Elizabeth (Lisa); Balter, Emily; Nkodo, Julie-Irene  
**Subject:** RE: Vale: Model Protective Order

### [ External Email ]

Andrew, Monica,

Thank you again for the productive call last week.

As to your request for an extension to the motion to quash, it would be helpful for us to have a better understanding of the outstanding issues regarding data in Europe. If the issues relate to data privacy, we would be amenable to a limited extension solely for the purposes of allowing you to seek relief from the Court in the event we are unable to reach agreement on a protocol for appropriate data privacy protections.

We are also following up to address your request for additions to your list of proposed search terms.

As discussed on our call, the search terms should include the names of all Defendants in the English Proceedings, as well as the individuals identified in the subpoenas as “Steinmetz’s Associates” and “Steinmetz’s Relatives.” You suggested that we identify certain email suffixes to facilitate your searches, which we have done below. As further discussed, this list of additional proposed search terms reflects our efforts to eliminate common names that will return significant numbers of false positives.

The additional search terms should therefore include those highlighted in yellow below:

### Initial Search Terms

You initially listed the following six terms:

- BSG\*
- Balda
- Nysco
- Vessna
- Invel
- Steinmetz

We would add to this list:

- Signa
- Benko
- Onyx
- Papachristophorou
- “Five Mounts”
- FMP
- Kaufhaus
- Chestergate

- Tarpley
- Perfectus
- Chrysler AND (Signa OR purchas\* OR KYC OR "EB-5")
- Chrysler w/30 (diligence OR agreement\* OR "financial statement\*" OR "EB-5" OR valu\* OR price\* OR ownership OR benef\*)

### Defendants in the English Proceedings

- *Beny Steinmetz* (Steinmetz is one of your initial proposed terms)
  - Beny
  - Benny
- *Dag Cramer*
  - Dag
  - Cramer
- *Marcus Struik*
  - Struik
- *Asher Avidan*
  - Avidan
- *Joseph Tchelet*
  - Yossie
  - Tchelet
- *David Clark*
  - No additional terms based on the high number of expected false positives
- *Balda Foundation* (Balda is one of your initial proposed terms)
  - Bonnant
  - Cortes
  - Goop
- *Nysco* (Nysco is one of your initial proposed terms)
  - No additional terms

### Steinmetz's Associates / Relatives

- Blackstock
- Bodin
- "Van Den Braber"
- Vandenbraber
- Degnarain
- Camhis
- Cilins
- Daskalakis
- Doron
- Edoh
- Gabay
- Granot
- Gur

- "Lev Ran"
- Levrán
- Menachem
- Ohad
- Meijer
- "Merloni Horemans"
- "Merloni-Horemans"
- Merlonihoremans
- Saada
- Mionis
- Moutafis
- Noy
- Paschos
- Peppas
- Pollak
- Prokopis
- Raz
- Sabag
- Varda
- Strykowski

Note that this list excludes all but a few particularly uncommon first names, and a number of common surnames, including Barnes, Barnett, Davis, Driver, Henderson, Hendricks, Levy, Maloney, Metcalf, Padgett, Quinn, and Shah.

#### Email Suffixes

- @bsgresources.com
- @bsgresources.gg
- @bsg-realestate.com
- @onyxfa.com
- @octeagroup.com
- @nornverdandi.com
- @nironmetals.com
- @gsolfund.com
- @invicta-advisory.com
- @nammax.com
- @infinitediam.com
- @steinmetzadvisors.com
- @rmaslimited.com
- @marxerpartner.com
- @bon-a.ch
- @stvictor.ch
- @rothschild.com
- @barlaw.co.il
- @gustafbodín.se
- @camhis.com
- @apmcyprus.com
- @apm-law.com
- @arkem.co.uk
- @silextrust.com

Best,  
Sam

—  
**Samuel Levander**

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**From:** Kratenstein, Andrew [mailto:AKratenstein@mwe.com]  
**Sent:** Tuesday, July 28, 2020 1:34 PM  
**To:** Nkodo, Julie-Irene ; Levander, Samuel  
**Cc:** Rosenthal, Jeffrey A. ; Vicens, Elizabeth (Lisa) ; Balter, Emily ; Asher, Monica  
**Subject:** RE: Vale: Model Protective Order

Sam/Julie-Irene,

When we spoke on July 23, you said that you would send us a list of revised search terms. When can we expect it?

We are also determining how much data is in Europe. While we work through that, can we agree on an extension of time re: the motion to quash until 8/14 so that we can try to work through these issues cooperatively and hopefully without motion practice?

Thanks,

Andrew

ANDREW B. KRATENSTEIN  
Partner  
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**Tel** +1 212 547 5695 | **Mobile** +1 646 338 4881 | **Email** akratenstein@mwe.com  
**Biography** | **Website** | **vCard** | **Twitter** | **LinkedIn**

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**From:** Kratenstein, Andrew  
**Sent:** Monday, July 27, 2020 4:07 PM  
**To:** 'Nkodo, Julie-Irene' <jnkodo@cgsh.com>; Asher, Monica <MAsher@mwe.com>  
**Cc:** Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Levander, Samuel <slevander@cgsh.com>  
**Subject:** RE: Vale: Model Protective Order

Attached.

ANDREW B. KRATENSTEIN  
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**Tel** +1 212 547 5695 | **Mobile** +1 646 338 4881 | **Email** akratenstein@mwe.com  
**Biography** | **Website** | **vCard** | **Twitter** | **LinkedIn**

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**From:** Nkodo, Julie-Irene <jnkodo@cgsh.com>  
**Sent:** Monday, July 27, 2020 4:03 PM

**To:** Kratenstein, Andrew <[AKratenstein@mwe.com](mailto:AKratenstein@mwe.com)>; Asher, Monica <[MAsher@mwe.com](mailto:MAsher@mwe.com)>  
**Cc:** Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Subject:** RE: Vale: Model Protective Order

**[ External Email ]**

Andrew, Monica,

Please find attached an executed Stipulation and Proposed Protective Order. Please sign and return to us at your earliest convenience. Thank you.

Best,  
Julie-Irene

—

**Julie-Irene Nkodo**

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T: +1 212 225 2527  
[jnkodo@cgsh.com](mailto:jnkodo@cgsh.com) | [clearygottlieb.com](http://clearygottlieb.com)

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**From:** Kratenstein, Andrew [<mailto:AKratenstein@mwe.com>]  
**Sent:** Thursday, July 23, 2020 4:46 PM  
**To:** Nkodo, Julie-Irene <[jnkodo@cgsh.com](mailto:jnkodo@cgsh.com)>; Asher, Monica <[MAsher@mwe.com](mailto:MAsher@mwe.com)>  
**Cc:** Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Subject:** RE: Vale: Model Protective Order

Julie-Irene,

Thanks. The form is fine. Please finalize.

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Biography | Website | vCard | Twitter | LinkedIn

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**From:** Nkodo, Julie-Irene <[jnkodo@cgsh.com](mailto:jnkodo@cgsh.com)>  
**Sent:** Thursday, July 23, 2020 3:50 PM  
**To:** Kratenstein, Andrew <[AKratenstein@mwe.com](mailto:AKratenstein@mwe.com)>; Asher, Monica <[MAsher@mwe.com](mailto:MAsher@mwe.com)>  
**Cc:** Rosenthal, Jeffrey A. <[jrosenthal@cgsh.com](mailto:jrosenthal@cgsh.com)>; Vicens, Elizabeth (Lisa) <[evicens@cgsh.com](mailto:evicens@cgsh.com)>; Balter, Emily <[ebalter@cgsh.com](mailto:ebalter@cgsh.com)>; Levander, Samuel <[slevander@cgsh.com](mailto:slevander@cgsh.com)>  
**Subject:** Vale: Model Protective Order

**[ External Email ]**

Andrew, Monica,

As discussed on our call, please find attached Judge Wang's Model Stipulation and Protective Order.

Best,

Julie-Irene

—

**Julie-Irene Nkodo**

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